

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA  
At Clarksburg

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

Criminal No. 1:13CR17

CHARLES ADKINS and  
LOTETTA MEREDITH,  
  
Defendants.

MOTION TO AMEND INITIAL SCHEDULING ORDER

NOW COMES Defendant Loretta Meredith, by counsel, Charles T. Berry, and respectfully moves this honorable Court to amend the Scheduling Order which was filed on May 15, 2013. In support of this motion, Defendant Meredith states as follows:

1. The initial Scheduling Order requires that the Government provide defendants with copies of pretrial discovery and inspections on or before May 22, 2013;
2. The Government did timely provide its initial discovery;
3. The Government has, since, supplemented its discovery twice: First on May 21, 2013 and again on June 3, 2013;
4. The discovery in this case is voluminous;

5. The supplemental discovery, including that which was received on June 3, 2013, contained four hundred twenty three (423) pages of documents and approximately fourteen (14) hours of audio tapes;
6. Currently, Defendants' pretrial motions are due on June 7, 2013;
7. Defendants will need reasonable time to file their pretrial motions, in light of the recently received supplemental discovery;
8. Currently, reciprocal discovery is due on June 5, 2013;
9. Similarly, Defendants will need reasonable time to file their reciprocal discovery, in light of the recently received supplemental discovery;
10. Reviewing and digesting the discovery in this case, including the supplemental discovery, will take substantial time;
11. Defendant Meredith respectfully requests that the current schedule be amended to require reciprocal discovery by June 18, 2013, and that the current schedule be amended to require pretrial motions by June 20, 2013;
12. If the proposed amendments are adopted, the Court could maintain the current trial date;
13. Counsel for Defendant Adkins joins in this motion; and
14. The undersigned is authorized to state that A.U.S.A. Shawn A. Morgan does not object to amending the current scheduling order.

WHEREFORE, for all of the reasons stated herein, Defendant Meredith, who is joined by Defendant Adkins, through and by his counsel, respectfully moves the Court to amend the Scheduling Order as requested herein.

LORETTA MEREDITH,

Defendant

/s/ Charles T. Berry  
Charles T. Berry [WVSB 7273]  
P.O. Box 5023  
Fairmont, West Virginia 26554  
(304) 363-3564  
(304) 816-3117 FAX  
[cberrylaw@hotmail.com](mailto:cberrylaw@hotmail.com)

CERTIFICATE OF SERVICE

The undersigned does hereby certify that the foregoing “Motion to Amend Initial Scheduling Order” was filed using the Court’s CM/ECF system; that AUSA Shawn A. Morgan and all counsel of record should receive a copy of the motion through the CM/ECF system; and that there are no non-CM/ECF participants acting as counsel in this case.

Dated this 4<sup>th</sup> day of June, 2013.

/s/ Charles T. Berry